

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

JUDY JIEN, *et al.*,

Plaintiffs,

v.

PERDUE FARMS, INC., *et al.*,

Defendants.

Civil Case No. SAG-19-2521

**MAR-JAC POULTRY, INC.’S MOTION TO DISMISS
FOR FAILURE TO STATE A CLAIM UNDER RULE 12(b)(6)**

Defendant Mar-Jac Poultry, Inc. (“Mar-Jac GA”), by and through their undersigned attorneys and pursuant to Fed. R. Civ. P. 12(b)(6) and Local Rule 105.1, move this Court to dismiss the Third Amended Complaint (“TAC”) in the above-captioned matter (ECF No. 590) with respect to Mar-Jac GA on the ground that the TAC fails to state a claim against Mar-Jac GA upon which relief can be granted.

In support of this motion, Mar-Jac GA relies upon the Memorandum in Support of Mar-Jac Poultry, Inc.’s Motion to Dismiss for Failure to State a Claim Under Rule 12(b)(6) filed contemporaneously herewith, together with the Declaration filed therewith.

Separately, Mar-Jac GA joins in full and adopts by reference Defendants’ Motion to Dismiss for Lack of Standing Pursuant to Rule 12(b)(1).

Respectfully submitted,

Date: April 18, 2022

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CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2022, the foregoing was filed electronically. Notice of this filing will be sent to all parties via the Court's CM/ECF system.

Date: April 18, 2022

/s/ Edward C. Konieczny
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